

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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E. JEAN CARROLL,

*Plaintiff,*

– against –

DONALD J. TRUMP,

*Defendant.*  
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Civil Action No.:  
22-cv-10016

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon the annexed: (a) Declaration of Matthew G. DeOreo, (b) the Local Rule 56.1 Statement of Defendant; and (c) the accompanying Memorandum of Law, Defendant will move this Court, before the Honorable Lewis A. Kaplan, U.S.D.J., in the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, N.Y. 10007, on such day when counsel may be heard, for an Order, pursuant to Fed. R. Civ. P. 56, dismissing Plaintiff's defamation claim (Count II of the Complaint filed in this action) in its entirety with prejudice, with such other and further relief as the Court deems just and proper.

Dated: New York, New York  
February 23, 2023

TACOPINA, SEIGEL & DeOREO

By:



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TO: All counsel by ECF